

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-7 Please provide BAMA best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would install tie cables in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

REPLY: The directly assigned labor rate for a Central Office Equipment Installation technician, \$48.25, is provided for under Job Function Code 43XXa in Attachment A, Workpaper X, Page 16 of BA-MA's February 9, 2000, Nonrecurring Cost Compliance Filing, referred to in BA-MA's Reply to RL/CVD 1-3.

Please see BA-MA's Reply to RL/CVD 1-5.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-12 Please identify the percentage of BAMA central office buildings that are staffed by at least one technician during normal business hours.

REPLY: Approximately 50 percent of BA-MA central office buildings are staffed by at least one technician.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-22 Please describe the types of incremental OSS costs that BAMA anticipates it might incur associated with its pre-order, order and billing systems to provide line sharing to competitors. For each type of cost identified, if BAMA believes that it would not incur that cost to provide its own DSL retail services or to support the provision of DSL services by an affiliate please explain why that is the case.

REPLY: BA-MA anticipates by non-limiting example that it will incur costs associated with Systems work to update internal wholesale pre-order, order and billing systems so as to implement the capability to service requests for line sharing. This effort will only be incurred to provide line sharing to Data Local Exchange Carriers ("DLECs").

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-23 Please describe the types of incremental OSS costs that BAMA anticipates it might incur associated with updating inventory and provisioning systems to provide line sharing to competitors. For each type of cost identified, if BAMA believes that it would not incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate please explain why that is the case.

REPLY: BA-MA anticipates that by non-limiting example that it will incur costs for Systems work to update internal wholesale provisioning and inventory systems, such as Work Force Administration ("WFA") and Loop Facility Assignment and Control System ("LFACS") so as to implement the capability to service requests for line sharing. This effort will only be incurred to provide line sharing to Data Local Exchange Carriers ("DLECs").

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-24 Please describe the types of incremental OSS costs that BAMA anticipates it might incur associated with testing and maintenance to provide line sharing to competitors. For each type of cost identified, if BAMA believes that it would not incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate please explain why that is the case.

REPLY: BA-MA anticipates by non-limiting example that it will incur costs associated with the Operational Support System created by Hekimian in connection with the implementation of the Wideband Testing System ("WTS"). These are incremental costs for testing shared lines and will only be incurred to provide line sharing.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY
COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-28 Please provide a complete copy of any analysis performed by BAMA or on BAMA's behalf within the last 2 years that analyses BAMA's ability to perform loop qualification for DSL services in a fully or partially mechanized manner.

REPLY: BA-MA objects to this request on the grounds that the request is irrelevant, immaterial and unduly burdensome in that it seeks past documentation that is not pertinent to current mechanization issues. Notwithstanding this objection, BA-MA responds as follows:

Bell Atlantic is pursuing, under the auspices of the New York DSL Collaborative process, a system interface which will provide the CLECs and affiliate with access to loop qualification data that is in the FACS database. The CLECs have had the opportunity to discuss the Telecordia solution directly with Telecordia. There has not been any decision about the proposals and as such there are no formal

documents or contracts for the proposal.

NET# 559

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-30 Please provide a detailed description of the process that any BAMA affiliate plans to use to determine if specific customers/customer locations qualify for retail ADSL service. Please provide a complete copy of whatever documentation BAMA's affiliate has developed for internal use that describes the current and planned future state of that process.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. BA-MA further objects on the grounds that the information requested is irrelevant as it relates to services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature. Notwithstanding this objection, BA-MA responds as follows:

BA-MA is not in a position to express an opinion concerning the

process any subsidiary may "plan" to utilize. It is, however, anticipated that any subsidiary will have access to and utilize the same processes as are or will be available to any other CLEC.

NET# 561

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-32 For each item that BAMA's Engineering personnel currently research to determine if an unbundled loop is DSL qualified on a competitive

carrier's behalf (e.g., splice points, bridge taps, load coils, cable gauge, etc.) please indicate the name of any BAMA electronic database that is designed to hold that data (e.g., "BAMA reviews cable gauge information. LFACS is designed to include cable gauge information.") Please specify if any data that BAMA believes is required to qualify as an unbundled loop for DSL services is not designed to be included in any current BAMA database/system (i.e., if the data is only found on paper records 100 percent of the time). If data resides both on mechanized systems and via paper records, please identify specifically what information resides on each and the extent to which the data, or portions thereof, is included in both. Please provide separate responses for each BAMA district if the responses would vary by district.

REPLY:

BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Notwithstanding this objection, BA-MA responds as follows:

The bulk of the information necessary to qualify a specific loop in the absence of a successful inquiry to the front end loop qualification system resides on paper plant location records.

NET# 563

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-33 Assume that BAMA is about to plan and construct all new outside plant facilities to serve a new business park and/or residential complex (creating new plant feeder and distribution routes from the ground up). In that circumstance please identify which database(s) BAMA would enter each of the following types of data into or indicate that the data would not be maintained in any electronic database or system.

- The location of splice points.
- Cable gauges
- Cable lengths
- FDI locations and types
- Electronics locations and types
- Bridge tap location and design
- Repeater location and type
- Availability of spare pair
- Identification of cables, binder groups, pairs
- Presence and type of DLC
- Location serving area interfaces

REPLY: BA-MA objects to this request on the grounds that the phrase "outside plant facilities" in this context is vague, ambiguous and overbroad. BA-MA further specifically objects on the grounds of undue burden and relevance. Notwithstanding this objection, BA-MA responds as follows:

The following list of locations where information on specific plant characteristics can be found is generally accurate. There may always be instances when a data base or record is not completely updated.

- Location of splice points - Paper plant location records.
- Cable Gauges - Plant location records, (see below).
 - Cable lengths - Plant location records, (LMU in LFACs will provide cable length by gauge).
 - FDI location and types - location is provided on plant location Records, FDI name and address (by BA naming conventions) is

REPLY: RL/CVD 1-33 contained in LFACs; question is too vague as to what is meant by (cont'd) "type" to further respond.

- Electronics Locations and types - types and cables/terminals served can be found in LFACS. Physical locations can be found on plant location records.
- Bridge Tap location and design - actual locations and lengths are found in plant location records, location with respect distance from CO may be found in LFACs; question is too vague as to what is meant by "design" to further respond.

- Repeater Location and Type - Plant Location records.
 - Availability of spare pair – LFACS.
 - Identification of Cables, Binder Groups, Pairs – Cable and Pair information is maintained on plant location records and in LFACs. Binder Group identification is not maintained. The identification of the binder group is dependent on the size and type of cable involved.
- Presence and type of DLC-Plant Location records/LFACs.
- Location serving area interfaces-Plant Location records.

NET# 564

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-35 Please describe each type of line conditioning (e.g., removing load coils or bridge tap, adding or removing repeaters, rearranging outside plant facilities) that BAMA will undertake (in any circumstance) in order to satisfy a request for its retail ISDN service. If BAMA claims that it will only condition lines in order to provide its own retail ISDN service in limited cases, please provide a complete description of each such limitation.

REPLY:

BA-MA objects to this request on the grounds that it seeks information concerning services not at issue in this proceeding or related to the provision of line sharing, such as ISDN service. BA-MA further objects to this request on the grounds that it seeks information that is not relevant to BA-MA's DSL and line sharing tariff offering.

NET# 566

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST:

Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-36 Please provide a copy of BAMA's methods and procedures for assessing conditioning charges on a BAMA end user of retail ISDN service. Please also provide any charges which apply and the source of the charges (intrastate tariff section, for example).

REPLY: BA-MA objects to this request on the grounds that it seeks information concerning services not at issue in this proceeding or related to the provision of line sharing, such as ISDN service. BA-MA further objects to this request on the grounds that it seeks information that is not relevant to BA-MA's DSL and line sharing tariff offering.

NET# 567

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry

Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-37 For each type of line conditioning (e.g., rearranging outside plant facilities) that BAMA might choose to perform in order to satisfy a request for its retail ADSL service or to provide a qualified line to a BAMA affiliate, please describe specifically how BAMA plans to recover any cost associated with that activity. Please also provide a citation to any language in BAMA's retail tariff(s) that supports its proposed method of cost recovery.

REPLY: BA-MA specifically objects to this request to the extent it calls for speculation as to how BA-MA may later "choose to perform" a specific function, and further specifically objects to the extent the question implies that BA-MA would treat an affiliate in a manner which does not comply with the legal requirements to treat affiliates in a non-discriminatory fashion. Notwithstanding this objection, BA-MA responds as follows:

BA-MA's retail ADSL tariffed service offering is not currently available to lines that require conditioning. There are a few lines for which the Company is exploring conditioning on a trial basis only.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-38 Is it BAMA's belief that both recurring and non-recurring costs should be calculated assuming the same network design? If "no", please explain BAMA's position on this issue.

REPLY: The answer necessarily depends, among other things, upon the nature of the costs (and of the underlying services) at issue. The non-recurring costs being considered in this proceeding are costs associated with a particular service — wholesale ADSL/HDSL-compatible loops and Digital Design Loops. The xDSL technologies at issue in this proceeding are, by definition, copper-based; that is, they can only be utilized over copper cables. It must be assumed that, where required for effective voice transmission, load coils are present on the copper loops. There is no reason that such costs should be based on the same network design (*i.e.*, universal deployment of DLC technology with integrated switch/loop interfaces) as was assumed in the development of recurring costs for the totally different loop types (*e.g.*, 2-wire analog loops used as surrogate for xDSL loops) considered in the Consolidated Arbitrations proceeding.

BA-MA believes that the assumptions underlying its cost studies for ADSL/HDSL-compatible loops are fully appropriate and consistent with applicable regulatory requirements.

NET# 569

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-39 Has BAMA done any analysis to establish that the combined cost study results for recurring and non-recurring costs for all loop types it provides represents a least-cost, most efficient plant design? If so, please provide a complete copy of that analysis.

REPLY: BA-MA's recurring and non-recurring cost studies were performed using a TELRIC approach. The network upon which the cost studies are based reflect an efficient plant design. The non-recurring cost studies capture only the work activities that must be performed to provide the service being requested, modified to make them forward-looking. By their nature, the studies provide a least-cost scenario.

NET# 570

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-41 If not provided in response to a previous request, please supply a copy of BAMA's engineering methods and procedures relative to conditioning work required to provide retail ISDN service.

REPLY: BA-MA objects to this request on the grounds that it seeks information concerning services not at issue in this proceeding or related to the provision of line sharing, such as ISDN service. BA-MA further objects to this request on the grounds that it seeks information that is not relevant to BA-MA's DSL and line sharing tariff offering.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-42 Please describe each type of outside plant work activity that BAMA has performed in order to supply retail ISDN-BRI (e.g., need to swap out bad pair, service grooming, need to move ISDN capable pair to provide service, etc.)

REPLY: BA-MA objects to this request on the grounds that it seeks information concerning services not at issue in this proceeding or related to the provision of line sharing, such as ISDN service. BA-MA further objects to this request on the grounds that it seeks information that is not relevant to BA-MA's DSL and line sharing tariff offering.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-43 Please provide a detailed description of how costs for each of the types of activity identified in response to the previous request are incorporated in BAMA's most recent loop cost study.

REPLY: BA-MA objects to this request on the grounds that it seeks information concerning services not at issue in this proceeding or related to the provision of line sharing, such as ISDN service. BA-MA further objects to this request on the grounds that it seeks information that is not relevant to BA-MA's DSL and line sharing tariff offering.

NET# 574

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-44 Is it BAMA's belief that it is not practical to "condition" multiple spare pairs either in advance or at one time to provide xDSL-type services to communities/customers who are currently served by long copper loops? If BAMA contends that such practices are not practical, please provide a complete description of BAMA's basis for that belief?

REPLY: BA-MA objects to this request on the grounds that the terms "practical" and "long copper loops" are vague and ambiguous, and that the request is irrelevant, immaterial and beyond the scope of this proceeding. Notwithstanding this objection, BA-MA responds as follows:

In an embedded network it is unlikely that a sufficient quantity of spare pairs can be found within a single binder group at any common location that would make it practical or cost efficient in the long run to "condition" multiple pairs in anticipation of a demand for xDSL services without incurring significant rearrangement costs or seriously affecting BA-MA's ability to provide basic voice grade services for new or added lines.

NET# 575

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-51 Does the retail ADSL cost study submitted with Bell Atlantic's FCC tariff for that service include any cost for electronics or fiber facilities associated with feeder facilities? If BAMA's answer is anything other than an unqualified "no," please provide the following:

- a. A detailed description of what costs were included for feeder fiber and of how those costs were calculated.
- b) A detailed description of what FDI or RT electronics costs were included and of how those costs were calculated.
- c) A detailed description of what central office line termination electronics costs were included and of how those costs were calculated.
- d) A detailed description of what DLC electronics costs were included and of how those costs were calculated.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to retail services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

BA-MA further objects to this request to the extent that it seeks materials, including without limitation pleadings, tariffs, agreements and other filings on the public record at the Federal Communications Commission ("FCC") or other state regulatory commissions, on the grounds that such materials are equally available to other parties as to BA-MA and requiring that BA-MA produce them is thus unduly burdensome.

BA-MA objects to any request that seeks to have BA-MA "describe" a document or create a special study, index, a "cross-reference" chart or other materials on the grounds that such a request is unreasonable, unduly burdensome to the extent that the information is not readily available and BA-MA is, therefore, required to undertake a time-consuming work effort, which can be performed by the parties themselves.

Notwithstanding its objection, BA-MA responds as follows:

REPLY: RL/CVD 1-51

(cont'd)

The request as phrased cannot be answered with a yes or no. The "configuration" assumed in the cost study that Bell Atlantic filed with the FCC consists of the components necessary to provision retail Infospeed DSL service, including DSLAMs, splitters, etc. BA-MA does not offer "unbundled access" to this "configuration" since it includes packet switching equipment not subject to the unbundling requirements of the Telecommunications Act of 1996, and thus the costs of such "access" are not identified in BA-MA's filing. However, CLECs can offer their own competitive data access service using unbundled elements or services, including DSL-compatible loops, loop conditioning, loop qualification, and line sharing.

NET# 582

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY
COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-55 Please provide a copy of the most recent documentation detailing any planned changes to BAMA's telecommunication plant that relate to the demand for retail Digital Subscriber Line ("DSL"). Provide all related documentation including but not limited to BAMA's planned methodology to provide DSL services to customers with relatively long loops or with loops that are provided over fiber feeder and DLC systems, relative to copper loops that require "conditioning," etc. If a BAMA-specific planning document does not exist, please provide whatever planning document would cover BAMA's service area (even if that documentation is not final or "approved").

REPLY: BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to retail services provided by a Bell Atlantic affiliate not regulated by the Department and are highly confidential, competitively sensitive business planning documents concerning anticipated consumer demand and how best to meet that demand. In addition, disclosure of such documents is inappropriate, unnecessary and detrimental to Bell Atlantic because it would provide an unfair competitive advantage to competitors in this proceeding by disclosing highly confidential information that is not relevant to the issues to be decided.

NET# 586

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-58 For each type of DLC equipment mentioned in response to the previous request, please indicate if BAMA believes that that equipment is currently being modified (or is in testing) to provide additional forms of DSL service. If "yes", please describe each type of DSL service that is under development.

REPLY: BA-MA is testing with vendors the current versions of equipment to verify the hardware's capability to support ADSL services.

NET# 589

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-62 Does BAMA believe that all retail DSL demand which is met by its own retail product (or the service of an affiliated provider), will be provisioned over all-copper loops (i.e., loops that do not include fiber feeder facilities) through at least 2002? Please provide a complete description of the basis for BAMA's response.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to retail services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

Notwithstanding this objection, BA-MA responds as follows:

BA-MA has no business reason to form a "belief" on this issue, since it is intended that DSL service in the Year 2002 will not be provisioned by BA-MA, but instead will be provided through a separate subsidiary.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-63 To the best of its knowledge and belief, does BAMA expect that any affiliated company will provide DSL services to end user customers whose local loops include any fiber cable? If anything other than an unqualified "no," please provide an outline of the overall arrangement of outside plant equipment (owned both by BAMA and/or by BAMA's affiliate) that BAMA believes will most likely use to provide that service.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to retail services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

Notwithstanding this objection, BA-MA responds as follows:

BA-MA has no business reason to form a "belief" on this issue, since it is intended that DSL service in the Year 2002 will not be provisioned by BA-MA, but instead will be provided through a separate subsidiary.

NET# 594

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-65 Please provide any internal policy guidelines and/or procedures regarding DSL deployment developed by Bell Atlantic and provided to BAMA, and any other such internal policy guidelines provided to BAMA. If such guidelines or procedures are under development or revision, or revised guidelines or procedures are expected to be released.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome, that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant to the issues to be decided, information provided by a Bell Atlantic affiliate not regulated by the Department and are highly sensitive business planning documents, which are inappropriate and unnecessary to the issues to be decided in this proceeding and, in any event, are not relevant to the issues to be decided.

Notwithstanding this objection, BA-MA responds as follows:

Information and timelines regarding Line Sharing deployment have been made available to the public through public collaboratives and are available on the New York Public Service Commission's public website.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY
COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1
DATED: June 5, 2000
ITEM: RL/CVD 1-67 Please provide copies of responses to any other data requests
propounded on BAMA in this proceeding (or any proceeding
consolidated with this proceeding).
REPLY: All such responses will be provided.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-73 Please identify each type of non Bell Atlantic employees that have direct access to the main distribution frame ("MDF") in Bell Atlantic's central offices for any purpose.

REPLY: BA-MA objects to this request on the grounds that the undefined term "types" of non-BA-PM employees is vague and ambiguous. Notwithstanding this objection, BA-MA responds as follows:

Non-BA-MA employees do not have direct access to the MDF. There are certain situations where contract employees may be performing new work on the MDF, but are not performing frame wiring on working circuits.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-87 Please state the average interval in which Bell Atlantic provisions hot-cut loops. Please also state the percentage of such loops that require a dispatch as part of the provisioning process.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Notwithstanding its objection, BA-MA responds as follows:

The standard interval for hot cut loops is 5 business days, however, many CLECs request a longer installation interval which results in an average completion interval of about 8 days. In some cases, a dispatch

is required with IDLC served loops. Approximately, 13 percent of the loop plant in Massachusetts is served with IDLC.

NET# 618

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-95 Please state whether Bell Atlantic is unable to provide collocation in any remote terminal in this state. Please state the reasons Bell Atlantic is unable to provide collocation in any such remote terminals.

REPLY: BA-MA is making collocation available to CLECs at or adjacent to the remote terminal in the Feeder/Distribution Interface, as contained in its tariff for this service filed on May 17, 2000 Part E, Section 11. See also Page 41 of the Direct Testimony of Amy Stern, filed on June 14, 2000.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-102 Please provide a complete copy of all documentation that Bell Atlantic intends to rely on to support the validity of its reported costs for each rate element that Bell Atlantic intends to charge to implement a line sharing arrangement for competitive carriers.

REPLY: Please see the cost support package attached to BA-MA's tariff filing of May 5, 2000, and the Direct Testimony of Mr. Meacham, filed June 14, 2000.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-103 If Bell Atlantic intends to rely on any existing study of the non-recurring cost for the tie cables/cross-connection used to implement any line sharing arrangement, please provide any analysis that Bell Atlantic has done to establish that the existing study assumptions (*e.g.*, cable lengths, frame types, *etc.*) apply to Bell Atlantic's proposed line sharing arrangement(s).

REPLY: Please see BA-MA's Reply to RL/CVD 1-3.

NET# 634

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1
DATED: June 5, 2000
ITEM: RL/CVD 1-106 Please supply Bell Atlantic's best estimate of the total hours of labor required to install the type of frame used to hold splitter shelves. Please also supply a description of the basis for and any documentation supporting bell Atlantic's reply.
REPLY: Please see BA-MA's Reply to RL/CVD 1-5.

NET# 637

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-107 Please provide a complete copy of all internal documentation related to plans to mechanize any portion of Bell Atlantic's systems and processes to qualify loops for ADSL service(s).

REPLY: BA-MA objects to this request on the grounds that the request is unreasonable because of the overly broad scope of the data requested and the burden of compliance. To comply fully with this request, BA-MA would need to conduct an extensive and time-consuming search to determine whether and to what extent documents exist that are responsive to this request and then assemble that information.

Notwithstanding this objection, BA-MA responds as follows:

Please see BA-MA's Reply to RL/CVD 1-28 and RL/CVD 1-29. That responses describes the status of efforts or plans to mechanize qualification of loops for ADSL service(s) and related documentation.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-110 If Bell Atlantic intends to rely on any existing study as the basis for the cost of engineering a line sharing arrangement, please provide any analysis that Bell Atlantic has done to establish that the existing study assumptions (e.g., cable lengths, frame types, etc.) apply to Bell Atlantic's proposed line sharing arrangement(s).

REPLY: Please see BA-MA's Reply to RL/CVD 1-3.